

# EXHIBIT 4

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

JOSEPH MANTHA, *on behalf of himself  
and all others similarly situated,*

Plaintiff,

v.

QUOTEWIZARD.COM, LLC,

Defendant.

Civil Action No. 1:19-cv-12235-LTS

**Amended and Corrected Supplemental Report of Anya Verkhovskaya**

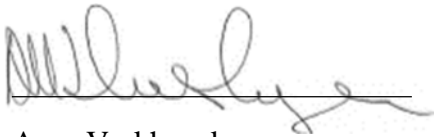
I, Anya Verkhovskaya, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am the President and Chief Executive Officer of Class Experts Group, LLC (CEG), a firm that offers litigation support services. I am the same Anya Verkhovskaya who submitted an Expert Report in this matter on September 22, 2023, and a Rebuttal Expert Report in this matter on November 22, 2023.

2. On or about December 5, 2023, as I prepared for my deposition in this case, it was discovered that there are two corrections.

- a. Paragraph 40.e. of my Expert Report should have listed two additional files that I did review and reply on: DRIPS000005 – CONFIDENTIAL Pursuant to the Court’s Default PO (1).csv and DRIPS000008 – CONFIDENTIAL Pursuant to the Court’s Default PO.csv. This had no effect on the opinions expressed in my Expert Report; and
- b. Exhibit J of my Expert Report and Exhibit 2 of my Rebuttal Expert Report should have excluded certain records. At Paragraph 84 of my Expert Report I described the process for removing records with certain business-related “Keywords” and the Keyword List itself was attached to that report as Exhibit I. Inadvertently, due to human error, the file attached to the report as Exhibit J represented my results through only the steps preceding the Keyword List removal step, and not after the Keyword List removal step.<sup>1</sup> There was another file reflecting the results of all steps through the post-Keyword List removals which should have been attached. Attached hereto as Corrected Exhibit 2 is the revised Exhibit 2 which reflects the Keyword List removals. Accordingly, the last two numbers at Paragraph 62 of the Rebuttal Expert Report should be corrected to 66,693 and 314,828 respectively.

Executed at Milwaukee, Wisconsin, this 8<sup>th</sup> day of December, 2023.

A handwritten signature in black ink, appearing to read 'Anya Verkhovskaya', written over a horizontal line.

Anya Verkhovskaya

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<sup>1</sup> Because the Rebuttal Expert Report carried forward the same records identified in the Expert Report's Exhibit J, it was necessary to apply the Keyword List removals to both Exhibit J of the Expert Report and Exhibit 2 of the Rebuttal Expert Report.

# Corrected Rebuttal Exhibit 2

**Provided in native format.**